

Exhibit C

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 JOSEPH JERMANO and DORY ANN
6 JERMANO, as parents and natural
7 guardian of MIA JERMANO, et al,
8 Plaintiffs,

9
10 -vs- Case No. 13-CV-10610

11
12 GRACO CHILDREN'S PRODUCTS, INC.,
13 Defendant.

14 _____/

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17 DEPONENT: ANDREW THIBODEAU
18 DATE: Thursday, August 21, 2014
19 TIME: 3:17 p.m.
20 LOCATION: COMFORT INN
21 6500 East Albain Road
22 Monroe Charter Township, Michigan
23 REPORTER: Karen Fortna, CRR/RMR/RPR/CSR-5067
24 JOB NO: 216697-D

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1 APPEARANCES:

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3 THOMAS, GARVEY & GARVEY

4 By: Mr. Andrew J. Miller

5 24825 Little Mack Avenue

6 St. Clair Shores, Michigan 48080

7 586.779.7810

8 Appearing on behalf of the Plaintiffs

9

10 SCHIFF HARDIN

11 By: Mr. Davin M. Reust

12 233 South Wacker, Suite 6600

13 Chicago, Illinois 60606

14 312.258.5500

15 Appearing on behalf of the Defendant

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I N D E X

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3 W I T N E S S

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5 ANDREW THIBODEAU

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7 Examination by Mr. Reust

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8 Examination by Mr. Miller

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E X H I B I T S

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EXHIBIT

DESCRIPTION

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None offered.

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1 them coming and waking you up?

2 A. Not that I remember.

3 Q. When was the last time that you had taken the
4 Darvocet before you were woken up that day?

5 A. Probably the night before. I don't remember. Just
6 guessing.

7 Q. Did you have any -- did it generally create any
8 complications for you?

9 A. No.

10 Q. Did it make you groggy or drowsy?

11 A. I mean, it does what Darvocet does.

12 Q. Okay. Had you drank anything alcoholic that day?

13 A. No.

14 Q. Had you taken any non-prescription narcotics or
15 medication?

16 A. No.

17 Q. So what is your recollection, what were you asked
18 by your sister or whoever else came in your room?

19 A. I think it was their ride fell through and they
20 were looking to get back before their curfew or
21 whenever they had to be home. And I didn't even
22 want to drive them, I was like hemming and hawing
23 about it, but they insisted, so I just gave them a
24 ride.

25 Q. And where was it that they wanted a ride to?